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May 31, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

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MAY 31 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket 92-297 (28 Ghz Band Plans)

Dear Mr. Caton:

The enclosed written material was delivered today to Chairman Reed Hunt, Commissioner Quello, Commissioner Chong, Commissioner Ness and other Commission representatives listed thereon.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "R. Gerard Salemmé".

R. Gerard Salemmé

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May 31, 1996

The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20544

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MAY 31 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket 92-297 (28 GHz Band Plans)

Dear Chairman Hundt:

It is AT&T's understanding that two 28 GHz band plans in CC Docket 92-297 are currently being reviewed by the Commission, namely "Option 1 prime" and "Option 4 prime." It is also AT&T's understanding that Option 1 prime involves use of the 31.0-31.3 GHz band for LMDS operations. AT&T would like to take this opportunity to include its views in the record in this proceeding.

AT&T strongly supports Option 1 prime and urges the Commission to adopt it promptly. Option 1 prime provides the requisite 1 GHz of usable uplink spectrum for GSO/FSS systems such as AT&T's VoiceSpan® system of satellites. The VoiceSpan system is specifically intended to bring the myriad capabilities of the National and Global Information Infrastructures to the general public at an affordable price. If the usable spectrum were to be reduced below the 1 GHz level as discussed below, there would be a concomitant reduction in the capability of the VoiceSpan system to deliver the opportunities of the NII and GII to the general public.

AT&T's opposition to Option 4 prime was first contained in its letter of March 7, 1996 to Mr. Scott Harris and Ms. Michele Farquhar. Since then, AT&T has identified additional facts discussed below that argue even more strongly against Option 4 prime and warrant Commission rejection of this option.

As AT&T discussed in its March 7 letter, Option four prime is unacceptable because it would strictly limit the use of 135 MHz (out of a total of 1010 MHz) to GSO/FSS gateway operations only. Option 4 prime assumes a particular GSO/FSS architecture that segregates the gateway and VSAT/customer premises equipment spectrum. However, AT&T's analysis continues to conclude that such segregation would be inefficient and unworkable for the VoiceSpan system. Furthermore, Option 4 prime carves up the spectrum in an inefficient manner so that an additional 42 MHz will not likely be used, leaving a net usable spectrum of approximately 833 MHz. This reduction of approximately 17% in spectrum and associated capacity (833 MHz vs. the 1000 MHz proposed in the Third NPRM) will have even more of a negative impact on the financial viability of the VoiceSpan system.

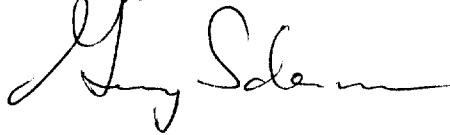
AT&T notes that any regulatory delay associated with Option 1 prime should be de minimis, particularly when compared with the opportunity that Option 1 prime presents for applicants to implement their business plans without any constraints on service that would be associated with Option 4 prime.

For all the reasons discussed above, AT&T respectfully urges the Commission to reject Option 4 prime and move promptly to adopt Option 1 prime.

Should other options that have previously been considered by the Commission staff be revisited, AT&T would like to take this opportunity to reiterate its support for any of those options (including the July 1995 proposal--"Option 1") that would provide the requisite 1 GHz of usable uplink spectrum for GSO/FSS systems such as VoiceSpan.

Thank you for this opportunity to express our views.

Sincerely,

A handwritten signature in black ink, appearing to read "Guy Sale", with a stylized flourish at the end.

cc: Mr. Rudolfo Baca
Ms. Lauren Belvin
Ms. Jackie Chorney
Ms. Michele Farquhar
Ms. Jennifer Gilsenan
Mr. Donald Gips
Ms. Giselle Gomez

Mr. Robert James
Mr. Karl Kensinger
Mr. Blair Levin
Ms. Susan Magnotti
Ms. Jane Mago
Dr. Michael Marcus
Mr. Harry Ng
Dr. Robert Pepper
Dr. Gregory Rosston
Mr. David Siddall
Ms. Suzanne Toller
Mr. Thomas Tycz
Ms. Jennifer Warren
Mr. David Wye